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August 16, 2010

Mr. Steve Tzhone (6SF-RA)
Superfund Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

Re: San Jacinto River Waste Pits Superfund Site
Monthly Progress Report No. 9 for July 2010/August 2010;
U.S. EPA Region 6, CERLCA Docket No. 06-03-10 UAO for RI/FS
Project Number: 090557-01

Dear Mr. Tzhone:

Attached please find the Monthly Progress Report No. 9 July 2010/August 2010. This report was prepared on behalf of the San Jacinto Group (International Paper and McGinnes Industrial Maintenance Corporation) for the San Jacinto River Waste Pits Superfund Site in Clearview, Texas. Should you have any questions, please contact me at (228) 818-9626 or email me at dkeith@anchorqea.com.

Sincerely,

A handwritten signature in blue ink that reads "David C. Keith".

David C. Keith
Project Coordinator

cc: Phil Slowiak, International Paper
Andrew Shafer, MIMC
Jennifer Sampson, Integral Corp.

Attachments

DCK/tlf

Monthly Progress Report No. 9 July 2010/August 2010
Submitted August 16, 2010
San Jacinto River Waste Pits Superfund Site
USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RIFS
Clearview, Texas

The Unilateral Administrative Order (UAO) for the Remedial Investigation/Feasibility Study (RI/FS) at the San Jacinto River Waste Pits Superfund Site in Clearview, Texas (USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RIFS) was issued on November 20, 2009. The Respondents include International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC).

A. Summary of Work Performed –July 2010/August 2010

The Respondents, Anchor QEA, and Integral Consulting completed work on the following tasks:

- Submitted Monthly Progress Report No. 8 on July 15, 2010.
- Provided EPA draft responses to comments on Fate and Transport Memorandum on July 17, 2010 and reviewed comments/responses with agencies in a conference call on July 19, 2010. Provided EPA a revised draft response to comments on July 27, 2010.
 - Provided EPA and TCEQ with flow data from Lake Houston on July 21, 2010, in response to the agencies' request for these data.
- Participated in a conference call with EPA Legal Counsel on August 2, 2010, to discuss Site History revisions in the RI/FS Work Plan.
- Met with EPA, TCEQ, and the trustees in Austin, TX on August 12, 2010, to discuss technical comments from EPA on the Tissue Sampling and Analysis Plan and the Technical Memorandum on Bioaccumulation.
- Worked with TxDOT and received a finalized access agreement with TxDOT for soil sampling in their right-of-way, and for planned RI/FS borings in the western impoundment of the Site.
- Completed the field collection of soil samples in the TxDOT right-of-way on August 12, 2010.

B. Summary of Agency Communications

The written communications between Respondents and EPA subsequent to the issuance of the UAO are summarized in the attached Table 1.



Monthly Progress Report No. 9 July 2010/August 2010
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C. Summary of Sampling Results

- Additional preliminary chemistry results for sediment samples collected in May 2010 were received by Integral during the reporting period. Preliminary results were recorded, and transferred to the data validation firm for validation.
- Data validation was completed, and all validated data were received by Integral on August 12, 2010. Data management steps to address changes resulting from data validation are in progress.

D. Problems, Delays and Solutions

- EPA and Respondents have been working and will continue to work through the Site history section of the RI/FS.

E. Projected Work for Next 2 Reporting Periods –August/September 2010

The Respondents, Anchor QEA, and Integral Consulting expect to complete the following tasks during the remainder of the month of August and during September 2010:

- Prepare a letter addendum for the Sediment Sampling and Analysis Plan to include three surface sediment samples in Cedar Bayou. These samples would be taken for characterization of Cedar Bayou as a potential background location for collecting large fish tissue.
- Prepare responses and a Draft Final of the Fate and Transport Memorandum.
- Submit proposed schedule for delivery of a Chemical of Potential Concern Technical Memorandum to EPA for input.
 - Initiate sediment data analyses related to this memorandum.
- Prepare a Soil Sampling and Analysis Plan.
- Prepare a Groundwater Sampling and Analysis Plan to be submitted on October 4, 2010.
- Prepare a schedule for development of a Chemical of Potential Concern Technical Memorandum.
- Continue to work with EPA, Big Star Barge & Boat Company, and TxDOT on Site access issues.
- Conduct soil sampling for the remaining soil borings in the western impoundment of the Site.

Monthly Progress Report No. 9 July 2010/August 2010
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USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RIFS
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- Respond to final agency comments on the Site History for the RI/FS Work Plan, and finalize the RI/FS Work Plan.
- Begin preparation and mobilization for tissue sampling.

F. Schedule

- The overall Draft project schedule was updated in the Draft Final RI/FS Work Plan and is attached. All future progress reports will include the most current RI/FS Schedule.

Prepared by:

David C. Keith

Project Coordinator

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from EPA Date	EPA Communication Summary	Notes
12/4/2009	Required Notifications pursuant to Paragraphs 51 and 75 of UOA	None	NA	Provided notice of intent to comply and "sufficient cause" defenses and identified Project Coordinator.
12/7/2009	Copies of Letters to McGinnes Heirs Regarding Site Access	None	NA	
12/10/2009	Draft Scoping Meeting Minutes	None	NA	
12/14/2009	Copy of Response from Big Star Barge & Boat Company Regarding Site Access	None	NA	
12/15/2009	Monthly Progress Report No. 1	None	NA	
12/18/2009	Status Report on Site Access	1/12/2010	Actions to date did not constitute "best efforts" to gain access.	Respondents and EPA spoke regarding the matter in further detail on 1/8/10.
12/21/2009	HASP	None	NA	
12/21/2009	Anchor QMP	None	NA	
12/21/2009	Integral QMP	None	NA	
1/7/2010	Request for comments regarding access agreement for Big Star Barge & Boat Company	None	NA	
1/11/2010	Proposed Draft AOC for time critical removal action	1/12/2010	Respondents' proposed AOC has been forwarded to headquarters and Philip Allen for comment. Time critical removal action requires imminent and substantial endangerment finding.	
1/12/2010	Copy of Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
1/12/2010	Notice of UAO Deficiency	None	Actions to date did not constitute "best efforts" to gain access.	
1/13/2010	Draft Sediment Sampling and Analysis Plan Minutes	None	NA	
1/13/2010	Draft Database and Data Exchange Minutes	None	NA	
1/15/2010	Monthly Progress Report No. 2	None	NA	
1/15/2010	Update Regarding Respondents' Efforts to Obtain Access Agreement, Response to Letter from Barbara Nann and Request for Extension	1/21/2010	Efforts to obtain Site access are "encouraging."	
1/20/2010	Correspondence from Port of Houston Authority regarding access	None	NA	
1/21/2010	Copies of Site Access Letter From Attorney for McGinnes Heirs	1/22/2010	EPA requested another copy of the letter	
1/21/2010	Correspondence with Port of Houston Authority Regarding revised fence alignment	None	NA	
1/22/2010	Copies of Site Access Letter From Attorney for McGinnes Heirs	None	NA	

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from EPA Date	EPA Communication Summary	Notes
1/25/2010	Copies of Letters Sent to Gary Gladfelter and Tanya Ammons Regarding Site Access	None	NA	
1/27/2010	Draft 1/20/10 Alignment Meeting Minutes	None	NA	
1/27/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA	
1/27/2010	EPA's response to Respondents' proposed AOC regarding Time Critical Removal Action	None	EPA will give Respondents additional time to respond as to whether Group wants to enter into AOC for Site stablization.	
1/29/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
2/2/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA	
2/4/2010	Respondents' proposed changes/comments on proposed AOC for Time Critical Removal Action	3/5/2010	Awaiting finalization of action memo for site stabilization before making additional changes to the AOC for site stabilization.	
2/10/2010	Draft Memorandum San Jacinto River Waste Pits Superfund Site Time Critical Removal Action	Non	NA	
2/11/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
2/11/2010	Copy of executed Consent Form for Site Access from Big Star Barge & Boat Company	2/17/2010	EPA approved of the form and will await an access agreement allowing for the RI/FS to take place.	
2/15/2010	Monthly Progress Report No. 3	None	NA	
2/16/2010	Draft Sediment Sampling and Analysis Plan/QAPP	None	Comments received March 10, 2010	
2/16/2010	Correspondence to EPA regarding update to Respondents' efforts to obtain access to the site	None	NA	
2/17/2010	Submitted the Agency Review Draft of the Quality Assurance Project Plan and Field Sampling Plan for Sediment Sampling	Consolidated comments received on March 10, 2010	Follow up meeting conducted with EPA, TCEQ and Trustees on March 16 and comment/response table developed for submittal with Draft Final report	Draft Final document submitted on 4/9/2010.
2/18/2010	Sampling Plan for sediment sampling on February 17, 2010.	2/19/2010	EPA will forward for review to EPA's financial assurance expert.	
2/18/2010	Correspondence from MIMC regarding financial assurance bond.	2/19/2010	EPA will forward for review to EPA's financial assurance expert.	
2/19/2010	Copy of presentation regarding Short-Term Communications Plan	None	NA	

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San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from EPA Date	EPA Communication Summary	Notes
2/22/2010	Letter to Barbara Nann regarding MIMC's responsibility to provide access to the V.C. McGinnes, Trustee tract.	None	NA	
3/18/2010	Draft Sediment Sampling and Analysis Plan Comment Review Meeting Minutes March 16, 2010, TCEQ, Austin Texas	None	NA	
4/7/2010	Draft Field Sampling Plan and Job Safety Analyses for the TCRA sampling	None	NA	This sampling was requested by EPA in an email on March 26, 2010.
4/9/2010	Submitted the Draft RI/FS Work Plan and SLERA	June 3, 1010	Comments received from EPA by email	
4/9/2010	Submitted the Draft Final of the Quality Assurance Project Plan and Field Sampling Plan for sediment sampling	None	NA	
4/15/2010	Submitted Monthly Progress Report No. 5 on April 15, 2010	None	NA	
		4/26/2010	Approval letter from EPA for implementation of the RI/FS Sediment QAPP/SAP.	Agency requested replacement pages for Final QAPP/SAP.
4/30/2010	Submitted replacement pages to EPA, TCEQ and the trustees for the Final SAP/QAPP on April 30, 2010 .	None	NA	
5/11/2010	Submitted the Draft Chemical Fate and Transport Modeling Study design and sampling and analysis plan addendum on May 11.	None	NA	
5/14/2010	Submitted a Soil Sampling and Analysis Plan for the TxDOT right-of-way to TxDOT and EPA.	None	NA	Submitted to TxDOT as part of effort to obtain access into the TxDOT right-of-way for RI/FS and TCRA activities.
5/17/2010	Submitted Monthly Progress Report No. 6 on May 17, 2010	None		
5/21/2010	Submitted revised TxDOT right-of-way sampling and analysis plan.	None		Comments received from TxDOT on May 25, 2010.
5/25/2010	Submitted email outlining sediment sampling and analysis deviations.	5/26/2010	EPA agreed to recommendations and asked that human health locatons on west bank be reconsidered.	Human health locations on west bank moved with EPA concurrence in email on May 28, 2010.
5/27/2010	Submitted revised TxDOT right-of-way sampling and analysis plan.	None		TxDOT approved the revised sampling and analysis plan on June 11, 2010.

Table 1
Summary of Agency Communication
San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from EPA Date	EPA Communication Summary	Notes
5/28/2010	Submitted email summary of VOC data from sediment sampling.	5/28/2010	EPA concurred that no further VOC analyses were required.	
6/7/2010	Response to 6/4/10 email from Barbara Nann regarding access for 3 soil samples in western impoundment.			
6/11/2010	Submitted Draft Tissue Sampling and Analysis Plan and Draft Technical Memorandum on Bioaccumulation Modeling on June 11, 2010.	None		
6/15/2010	Submitted Monthly Progress Report No. 7 on June 15, 2010	None		
6/25/2010	Submitted comments and responses on Draft RI/FS Work Plan	None		
7/9/2010	Submitted Revised Draft RI/FS Work Plan	7/12/2010	Email from B. Nann forwarding edits to RI/FS work plan.	
7/15/2010	Submitted Monthly Progress Report No. 8 on July 15, 2010.	None		
7/27/2010	Provided EPA a draft response to comments on the Draft Fate and Transport Memorandum Review.	8/12/2010	Email from S. Tzhone forwarding two additional comments on the Fate and Transport Modeling Memorandum	

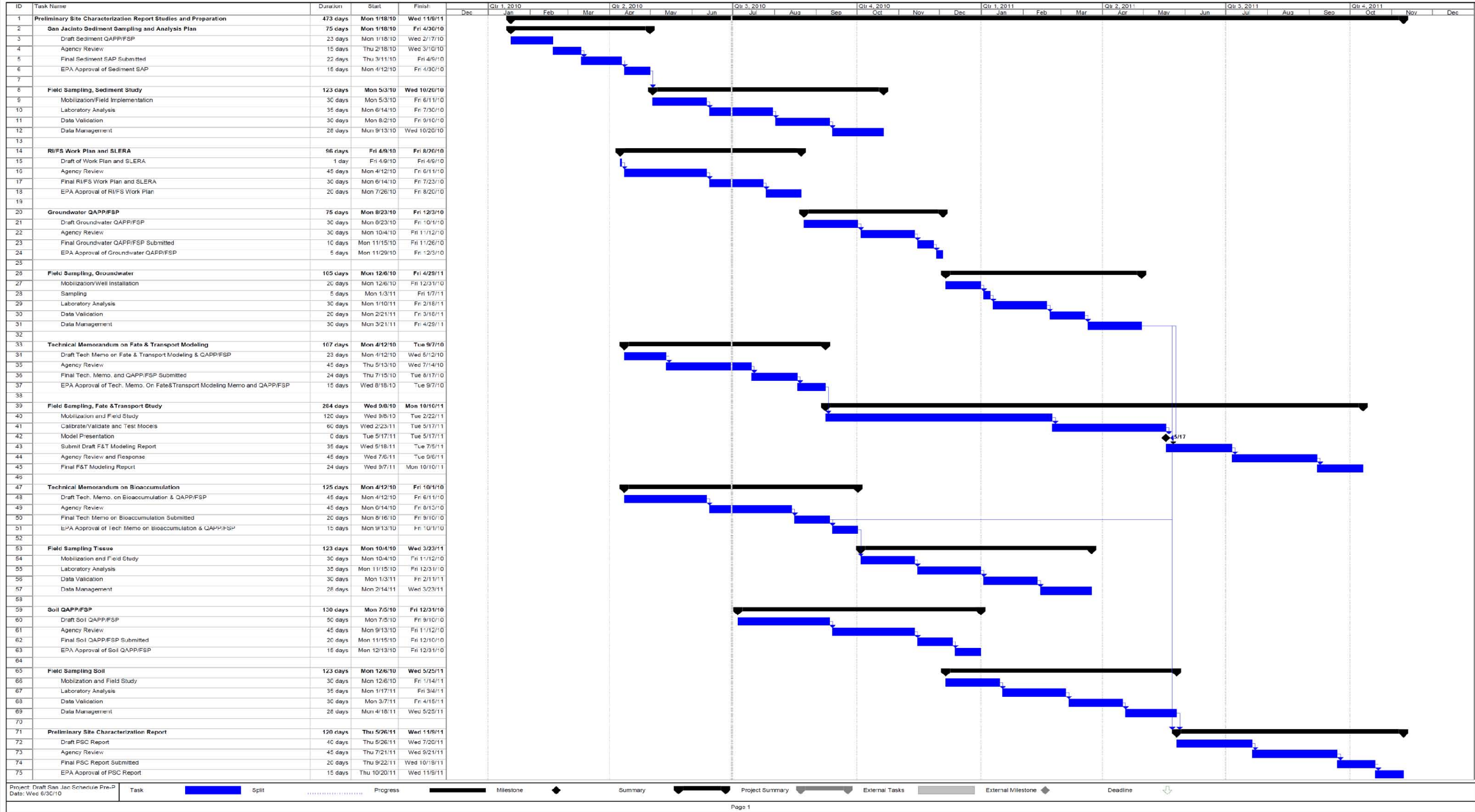


Figure 8-1a
Schedule of Deliverables Pre Preliminary Site Characterization Report
SJRW P RI/FS Work Plan
SJRW P Superfund/MIMC and IPC